

R E M A R K S

Reconsideration of the present application in view of the foregoing proposed amendments, as well as the following remarks is respectfully requested.

In the present application, claims 1-17 have been canceled hereby, with newly added claims 18-34 presently pending. No new matter has been added via the proposed pending claims, as support for such claims is found in the original specification.

Applicant(s) express appreciation for the finding of allowable subject matter relative to original claims 9, 14, 16 and 17, and respectfully submit that the amendment(s) to the specification, and the present pending claims proposed hereby bring the application into condition for allowance.

With respect to original claims 1-5, 8 and 11, which were rejected under 35 USC 102(e) as being anticipated by USP6645008 to Massey et al. (the “‘008 patent”), it is respectfully submitted that such patent, contrary to that which is suggested via the Office Action, clearly does not teach, disclose or suggest “at least one chamber is at least substantially seamlessly manufactured” (emphasis added). Rather, the ‘008 patent clearly teaches away from any such configuration by requiring that two conductive layers be stitched or (*see, e.g., col.6, lns.21-58 of the ‘008 patent*), which arrangement, irrespective of stitching or gluing clearly creates a seam as understood in the art (i.e., a line along which pieces of material are joined). It is further noted that the ‘008 patent does not seem to define a chamber formed with both a conductive portion and a non-conductive portion, but rather clearly requires two “conductive layers” (i.e., layers 12 and 16) only (*see, e.g., Figs. 6 and 7 (below) of the ‘008 patent*).

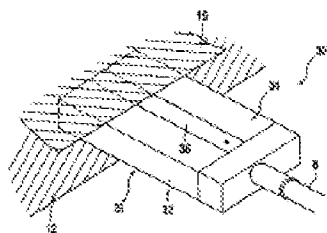


FIG. 6

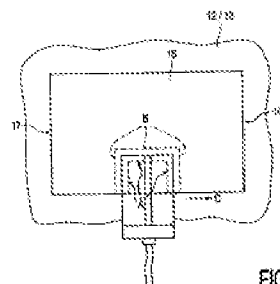


FIG. 7

Accordingly, Applicant(s) respectfully submit that present claim 18 (and all claims depending therefrom) are clearly patentable over the '008 patent at least for the foregoing reason(s).

Concerning present claim 28, Applicant(s) respectfully submit that at least for reasons similar to those discussed above relative to claims 18, this claim (and all depending therefrom) are likewise patentable over the '008 patent.

Turning to the 35 USC 102(b) rejection of original claim 1 in view of USP4777344 to Nash et al., (the "'344 patent"), it is respectfully noted that the Office Action seems to erroneously suggest that "heating elements 26" of the '344 patent can read on both the "fabric electrodes" and the "conductive inner surfaces" of original claim 1. Moreover, Applicant(s) respectfully submit that like the '008 patent, the '344 patent, among other things, at least fails to disclose, suggest or teach "at least one chamber is at least substantially seamlessly manufactured" (emphasis added). Hence, Applicant(s) respectfully submit that present claim 18 is patentable over the '344 patent at least for this reason.

Concerning the 35 USC 103(a) rejection of original claim 10 in view of the '008 patent, it is respectfully submitted, at least for the reasons heretofore discussed relative to noted shortcomings of the '008 patent relative to the claimed subject matter, as well as the newly proposed present claims, that the '008 patent is insufficient to support a claim of *prima facie* obviousness.

With respect to the 35 USC 103(a) rejection of original claims 12, 13 and 15 in view of the '008 patent in combination with USP5390433 to Brady (the "'433 patent"), it is respectfully submitted, at least for the reasons heretofore discussed relative to noted shortcomings of the '008 patent relative to the claimed subject matter (which shortcomings the '433 patent fails to address), as well as the newly proposed present claims, that the cited combination is insufficient to support a claim of *prima facie* obviousness.

Accordingly, in view of at least the foregoing, Applicant(s) respectfully request reconsideration and withdrawal of any objection(s)/rejection(s) to the specification and/or claims,

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and earnestly solicit a Notice of Allowance.

Respectfully submitted,



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